

**REMARKS**

Applicant respectfully requests further examination and reconsideration in view of the comments set forth fully below. Claims 1-33 and 35-41 were previously pending in this application. Within the Office Action, Claims 1-33 and 35-41 have been rejected. By the above amendment, Claims 1 and 28 have been amended and Claim 8 has been canceled. Accordingly, Claims 1-7, 9-33 and 35-41 are now pending in this application.

**Rejections Under 35 U.S.C. § 101**

Within the Office Action, Claims 28-32 have been rejected under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter. Specifically, within the Office Action it is stated that the language of the claim raises a question as to whether the claim is directed merely to an abstract idea that is not tied to a technological art, environment or machine which would result in a practical application producing a concrete, useful and tangible result. Further the Office Action states that a location table is software per se, which does not fall under one of the statutory categories. In light of the above amendments, the Applicants respectfully submit that Claims 28-32 are now in an allowable condition.

**Rejections Under 35 U.S.C. § 103**

Within the Office Action, Claims 1-33 and 35-41 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0173981 to Stewart (hereinafter “Stewart”) in view of U.S. Patent Application Publication No. 2004/0002343 to Brauel et al. (hereinafter “Brauel”).

Stewart teaches a system and method for enabling a business to register a domain location to provide location based services to on-site customers. [Stewart, Abstract]. Specifically, Stewart teaches a domain place registry where physical domain name information is stored and a domain

place registration web site which a business may access to register a domain location and to specify desirable known geographic location (“KGL”) services to be available at the location. [Stewart, ¶ 0008]. However, Stewart does not teach a method of generating a location table corresponding to the network address and location of access points for a first communication from each of the access points. Also Stewart does not teach providing localized information obtained from a localized information database. Further, as recognized in the Office Action, Stewart does not teach that the location table includes a plurality of entries having a network address corresponding to one of the access points.

Stewart teaches that the known geographic location (KGL) services or localized information is obtained by the system through the specification of the localized information by businesses on the domain place registry. [Stewart, ¶ 0036]. In other words, Stewart teaches that localized information regarding any one location is obtained from and specified by the businesses that register on the domain place registry. In fact, Stewart’s entire purpose is to provide a registry where localized information can be obtained from the businesses themselves. [Stewart, Abstract] Within the Office Action, it is stated that a localized information database is taught by Stewart in paragraph 47 stating “where localized information such as maps of the area or advertisements or services of business or nearby businesses.” [Office Action, page 3]. However, paragraph 47 of Stewart is referring to “KGL information” meaning physical location information, not “KGL services” meaning localized information. [Stewart, ¶ 47]. Furthermore, nowhere in paragraph 47, nor the rest of Stewart, is a localized information database taught as the source of KGL services. As a result, Stewart teaches that a business can register a domain and specify localized information so as to provide location based services to on-site customers, not that the localized information is obtained from a localized information database.

Furthermore, Stewart does not teach a method of generating a location table corresponding to the network address and location of access points for a first communication from each of the access points. Stewart teaches that access points “may store [their] KGL

information and may transmit the [access point's] KGL to the system.” [Stewart, ¶ 0065] (emphasis added). Stewart does not teach that access points transmit network address and location information upon the first communication from each access point. Specifically, Stewart teaches that the access points may be used to store their KGL information and then to transmit that information any time they communicate with the registry. [Stewart, ¶ 0065]. Stewart does not teach creating a new entry in a location table containing the access point's network address and location only upon the first communication and thereby not needing the access point to transmit the information again on subsequent communications. As a result, Stewart does not teach a method of generating a location table corresponding to the network address and location of access points for a first communication from each of the access points.

Brauel teaches a communications network including a communication server 102 coupled to a plurality of access points 106. Brauel teaches that the plurality of access points 106 are capable of wireless communications with one or more mobile wireless communication devices 120. [Brauel, ¶ 0021] Brauel teaches that the wireless communication devices 120 determine their own location based on information provided by the communication server 102. [Brauel, ¶ 0025] Brauel further teaches that a location table 104 including physical location information of each of the access points 106 is included in the communication server 102. [Brauel, ¶ 0025]. However, Brauel does not teach that the location information is determined at an internet portal for a device based on the location table or that a controller within an apparatus providing an internet site, determines the location information based on the location table. Furthermore, Brauel does not teach a method of generating a location table corresponding to the network address and location of access points for a first communication from each of the access points. Nor does Brauel teach providing localized information obtained from a localized information database.

Each of the Applicant's independent claims teach either a method of generating a location table corresponding to the network address and location of access points for a first

communication from each of the access points, or providing localized information obtained from a localized information database. As a result, as described above, because both Stewart and Brauel do not teach a method of generating a location table corresponding to the network address and location of access points for a first communication from each of the access points or providing localized information obtained from a localized information database, neither Stewart, Brauel nor their combination teach the claims of the present invention.

Further, there is no hint, teaching or suggestion within either Stewart or Brauel that justifies their combination. Stewart is directed to a domain registry for businesses to specify location specific services to be provided at any one location. [Stewart, Abstract]. Brauel is directed to location determination in wireless network to improve services provided by wireless devices. [Brauel, Abstract]. A business registry system and a wireless device location determination system are non-analogous art. More is required to justify the combination of two references. There is simply no hint, teaching or suggestion within either of these references that warrants or justifies their combination. Accordingly, the combination of Stewart and Brauel is improper and should be withdrawn.

The independent Claim 1 is directed to a method of providing localized information to a user accessing an internet site through an access point. The method of Claim 1 comprises determining a network address corresponding to the access point, obtaining location information corresponding to the network address from a location table, wherein the location information is determined at an internet portal based on the location table, obtaining the localized information from a localized information database using the location information and providing the localized information to the user through the access point. As described above, neither Stewart, Brauel nor their combination teach a method of generating a location table corresponding to the network address and location of access points for a first communication from each of the access points or providing localized information obtained from a localized information database. For at least

these reasons, the independent Claim 1 is allowable over the teachings of Stewart, Brauel and their combination.

Claims 2-7 are all dependent on the independent Claim 1. As described above, the independent Claim 1 is allowable over the teachings of Stewart, Brauel and their combination. Accordingly, Claims 2-7 are all also allowable as being dependent on an allowable base claim.

The independent Claim 9 is directed to a method of generating a location table corresponding to locations of access points. The method of Claim 9 comprises obtaining a network address of one of the access points from a communication received from one of the access points, obtaining location information corresponding to a physical location of one of the access points, wherein the physical location is determined at an internet portal, generating an entry within the location table including the network address and the location information and repeating the steps above for a first communication from each of the access points. As described above, neither Stewart, Brauel nor their combination teach a method of generating a location table corresponding to the network address and location of access points for a first communication from each of the access points or providing localized information obtained from a localized information database. For at least these reasons, the independent Claim 9 is allowable over the teachings of Stewart, Brauel and their combination.

Claims 10-13 are dependent on the independent Claim 9. As described above, the independent Claim 9 is allowable over the teachings of Stewart, Brauel and their combination. Accordingly, Claims 10-13 are all also allowable as being dependent on an allowable base claim.

The independent Claim 14 is directed to an apparatus to provide an internet site and capable of being accessed through an access point. The apparatus of Claim 14 comprises a location table including a plurality of entries each having a network address and location information corresponding to the access point, a localized information database coupled to the location table to provide localized information based on the location information and a controller coupled to the location table and the localized information database for determining

the location information based on the location table. As described above, neither Stewart, Brauel nor their combination teach a method of generating a location table corresponding to the network address and location of access points for a first communication from each of the access points or providing localized information obtained from a localized information database. For at least these reasons, the independent Claim 14 is allowable over the teachings of Stewart, Brauel and their combination.

Claims 15-20 are all dependent on the independent Claim 14. As described above, the independent Claim 14 is allowable over the teachings of Stewart, Brauel and their combination. Accordingly, Claims 15-20 are all also allowable as being dependent on an allowable base claim.

The independent Claim 21 is directed to an apparatus for providing an internet site and capable of being accessed through an access point. The apparatus of Claim 21 comprises a first means for maintaining a plurality of entries each having a network address and location information corresponding to the access point, a second means for maintaining a localized information database coupled to the first means for maintaining and for providing localized information based on the location information and a controlling means coupled to a location table and the localized information database for determining the location information based on the location table. As described above, neither Stewart, Brauel nor their combination teach a method of generating a location table corresponding to the network address and location of access points for a first communication from each of the access points or providing localized information obtained from a localized information database. For at least these reasons, the independent Claim 21 is allowable over the teachings of Stewart, Brauel and their combination.

Claims 22-27 are all dependent on the independent Claim 21. As described above, the independent Claim 21 is allowable over the teachings of Stewart, Brauel and their combination. Accordingly, Claims 22-27 are all also allowable as being dependent on an allowable base claim.

The independent Claim 28 is directed to an internet site for providing localized information from a localized information database to users through an access point. The internet site of Claim 28 comprises a location table maintained by the internet site comprising a plurality of entries, each entry including a network address corresponding to the access point, and location information corresponding to the access point and a controller associated with the internet site for determining location information based on the location table. As described above, neither Stewart, Brauel nor their combination teach a method of generating a location table corresponding to the network address and location of access points for a first communication from each of the access points or providing localized information obtained from a localized information database. For at least these reasons, the independent Claim 28 is allowable over the teachings of Stewart, Brauel and their combination.

Claims 29-32 are dependent on the independent Claim 28. As described above, the independent Claim 28 is allowable over the teachings of Stewart, Brauel and their combination. Accordingly, Claims 29-32 are all also allowable as being dependent on an allowable base claim.

The independent Claim 33 is directed to a network of devices. The network of Claim 33 comprises one or more access points to provide access to an internet site, one or more internet access systems, each capable of communicating with the one or more access points to access the internet site through one of the access points, an apparatus to provide the internet site and capable of being accessed through the one or more access points comprising a location table including a plurality of entries each having a network address and location information corresponding to an appropriate one of the access points and a localized information database coupled to the location table to provide localized information based on the location information, wherein the location information is determined at the apparatus based on the location table. As described above, neither Stewart, Brauel nor their combination teach a method of generating a location table corresponding to the network address and location of access points for a first communication from each of the access points or providing localized information obtained from a localized

information database. For at least these reasons, the independent Claim 33 is allowable over the teachings of Stewart, Brauel and their combination.

Claims 35-41 are all dependent on the independent Claim 33. As described above, the independent Claim 33 is allowable over the teachings of Stewart, Brauel and their combination. Accordingly, Claims 35-41 are all also allowable as being dependent on an allowable base claim.

For the reasons given above, the Applicant respectfully submits that the pending claims are now in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, he is encouraged to call the undersigned at (408) 530-9700 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,  
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